# Before the Federal Communications Commission Washington, D.C. 20554

# ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT OF NEW HOPE TELEPHONE COOPERATIVE, INC.

## EB Docket No. 06-36

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of New Hope Telephone Cooperative, Inc. (hereinafter, "New Hope") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, et seq. on behalf of New Hope:

- 1. I have personal knowledge that New Hope has implemented a system by which the status of a customer's Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
- 2. I have personal knowledge that New Hope obtains written approval for the use of its customers' CPNI and that New Hope has notified its customers of their right to restrict New Hope's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
- 3. I have personal knowledge that New Hope has designated a CPNI Compliance Officer, who is responsible for supervising the use, disclosure, distribution or access to its customers' CPNI, that New Hope has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001, et seq. and that New Hope has an express disciplinary process in place to deal with breaches of CPNI.
- 4. I have personal knowledge that New Hope implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
- 5. I have personal knowledge that New Hope maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. New Hope retains all such records for a minimum period of one (1) year.

- 6. I have personal knowledge that New Hope has established a supervisory review process regarding New Hope's compliance with the Federal Communications Commission's rules for outbound marketing situations and that the company maintains records of such compliance for a minimum period of one (1) year. New Hope's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- 7. I have personal knowledge that New Hope has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of New Hope, I represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject New Hope to enforcement action.

Executed on this 28th day of February, 2014.

NEW HOPE TELEPHONE COOPERATIVE, INC.

Rv

Printed: Tanny Weeks

As Its: Manager Administrature

### Annual 47 C.F.R. § 64.2009(e) CPNI Certification

### EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2013

Date filed: February 28, 2014

Name of company covered by this certification: New Hope Telephone Cooperative, Inc.

Form 499 Filer ID: 0005-0820-60

Name of signatory: Tammy Weeks

Title of signatory: Manager of Administrative Services

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In response to the Federal Communications Commission's ("Commission") rules and policies, New Hope Telephone Cooperative, Inc., states as follows:

I, Tammy Weeks, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules, as set forth in 47 C.F.R. § 64.2001, et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001, et seq. of the Commission's rules, including those mandating the adoption of CPNI procedures, training, recordkeeping and supervisory review.

The company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed